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8 Attorney for Defendant
9 GERALD ARMSTRONG

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF LOS ANGELES

9	CHURCH OF SCIENTOLOGY)	Case No. BC 884 642
10	INTERNATIONAL, a California)	
11	not-for-profit religious)	DECLARATION OF VICKI J. AZNARAN
12	corporation;)	IN SUPPORT OF DEFENDANT'S
13)	<u>SPECIAL MOTION TO STRIKE</u>
14	Plaintiff,)	
15	vs.)	
16	GERALD ARMSTRONG; THE GERALD)	
17	ARMSTRONG CORPORATION, a)	Date:
18	California corporation; DOES)	Time:
19	1-25, inclusive;)	Dept: 83
20	Defendants.)	Discovery Cut Off: None
21)	Motion Cut Off: None
22)	Trial Date: None

18 VICKI J. AZNARAN declares:

19 1. My name is Vicki J. Aznaran. I am above the age of

20 eighteen years old, and am not a party to this lawsuit.

21 2. The facts and allegations herein contained are, save

22 when stated or appear to the contrary, within my own personal

23 knowledge and belief and if called upon to do so I could and would

24 testify to the same in open court.

25 3. I was a member of the Scientology organization from 1972

26 to 1987, and a member of Scientology's Sea Organization, or "Sea

27 Org," from 1978 to 1987. I held several executive positions

28 within the Sea Org, which has unlimited power over all other

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1 junior Scientology organizations internationally.

2 4. From 1984 until 1987, I was Inspector General and
 3 "President" of Religious Technology Center, or "RTC," a supposedly
 4 separate Scientology corporation established to control all of
 5 Scientology through its ownership of the subject's trademarks. In
 6 truth, all of Scientology is one organization, its many
 7 "corporations" are completely devoid of corporate integrity, and
 8 all "corporations" and Scientology staff members are under the
 9 command of one person. Until his death in 1986 this one person
 10 was Scientology's founder L. Ron Hubbard. Following Mr. Hubbard's
 11 death Scientology has been controlled and operated by David
 12 Miscavige.

13 5. By virtue of my position in RTC, I was "in the loop" to
 14 receive communications about some of Scientology's most secret
 15 operations. I had numerous discussions and meetings with top
 16 Scientology "intelligence" officials and other executives, and
 17 read many documents which passed across my desk or came to my
 18 computer. I was briefed on and sometimes a participant in meetings
 19 involving litigation tactics and various means, including dirty
 20 tricks, to attack and fight the organization's "enemies." Because
 21 of my position and the regular reports that came across my desk I
 22 know that throughout my presidency of RTC that Fair Game actions
 23 against enemies were commonplace. In addition to the litigation
 24 tactics described below, fair game activities included burglaries,
 25 assaults, disruption of enemies' businesses, spying, harassing
 26 investigations, abuse of confidential communications in members'
 27 files and so on. As President of RTC and a Sea Organization
 28 member, I attended meetings concerning the numerous legal actions

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1 involving Scientology organizations. During this time period, I
 2 had personal access to all legal documents having to do with RTC.
 3 I received a report every day on my computer that included a
 4 synopsis of each ongoing legal case involving Scientology. I
 5 received, or I was told, copies of every major motion filed in
 6 cases involving Scientology. I was on the "approval line" for
 7 legal documents dealing with RTC. During this time period, I had
 8 the option of attending legal meetings, although some were
 9 mandatory. I attended many litigation meetings and became
 10 generally aware of Scientology's dirty tricks and legal maneuvers.
 11 At least in theory, I was the head of RTC and had access to any
 12 business or litigation "secrets" of Scientology.

13 6. Enemies of Scientology are deemed to be "suppressive
 14 persons," or "SPs." One becomes an SP by doing something the
 15 organization's leaders consider a "suppressive act," such as suing
 16 Scientology, either as a litigant or his or her lawyer. Anyone
 17 "declared" a suppressive person may be tricked, cheated, lied to,
 18 stolen from, sued or destroyed, without any discipline to the
 19 Scientologist doing the trickery, cheating, lying, theft or
 20 destruction. These acts are considered laudable within
 21 Scientology in dealing with an SP. This policy and practice is
 22 often referred to as "Fair Game," the name given it in the 1960's
 23 by its originator, L. Ron Hubbard. Mr. Hubbard issued a later
 24 policy directive, ordering that the term "Fair Game" no longer be
 25 used because it caused public relations problems, but keeping
 26 intact Scientology's treatment of SPs. The Fair Game policy was
 27 never canceled, and even the term continued to appear within
 28 organization orders and policy directives after its supposed

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1 "cancellation." Scientology's labelled enemies are treated as
2 Fair Game.

3 7. Hubbard writings encourage Scientologists to pursue
4 litigation purely for harassment without regard to the merits of a
5 claim to cause enemies to fold. It is one of the stated policies
6 and practices of Scientology to use the legal system to abuse and
7 harass its enemies. This involves doing anything and everything
8 possible to harass the opposing litigant without regard to whether
9 any particular action, motion or maneuver is legal, appropriate or
10 warranted by the facts or applicable law. That policy was
11 followed in every legal case with which I was involved or learned
12 about while inside the organization. Scientology's management
13 consistently expressed and demonstrated a complete disdain for the
14 court system, viewing it as nothing more than a way of harassing
15 "enemies." One of the litigation practices of Scientology is to
16 never turn over information in discovery without first calling out
17 (deleting or destroying) material that will harm Scientology or
18 assist its opponents. I personally participated in that practice
19 as described below.

20 8. In 1986, in the case of Scientology vs. Gerald
21 Armstrong, Los Angeles Superior Court No. C 420153, Judge Paul G.
22 Breckenridge, Jr. ordered the production of Mr. Armstrong's
23 auditing files (also called "pre-clear" or "pc" files or folders).
24 These are files maintained by the organization on those
25 individuals who submit to interrogation sessions in Scientology's
26 "psychotherapy" process called auditing. During the course of
27 that litigation I was instructed to go through Mr. Armstrong's pc
28 folders and destroy or conceal anything that might be damaging to

1 Scientology or helpful to Armstrong's case. As ordered I went
 2 through the files and destroyed contents that might support Mr.
 3 Armstrong's claims against Scientology. This pc folder culling,
 4 as it is known inside Scientology, took place at 4751 Fountain
 5 Avenue in Los Angeles, California and I was assisted by then
 6 Scientologist Jesse Prince.

7 9. Contrary to Scientology's representations that auditing
 8 files are kept confidential between the preclear and his auditor,
 9 preclear folder contents are available to and viewed by the
 10 organization's "ethics" and intelligence personnel and any senior
 11 executive. The preclear's "confidential" statements made in
 12 auditing were routinely used to control him or her, for their
 13 intelligence value and for blackmail. In addition to culling
 14 preclear folders in anticipation of their production in
 15 litigation, they are culled for embarrassing information, crimes,
 16 sexual history, incidents of all kinds and connections for
 17 intelligence purposes and ultimately for intelligence operations
 18 against the organization's perceived enemies.

19 10. Scientologists are expected to lie in their oral or
 20 written sworn statements, and they are trained and drilled to do
 21 so. This is an acceptable practice in Scientology because the
 22 litigation "enemies," about whom the sworn testimony concerns, are
 23 "SPs" and "Fair Game."

24 11. Additional Fair Game activities of which I was aware
 25 undertaken by Scientology against Armstrong included, but were not
 26 limited to, constant surveillance by private investigators,
 27 attempting to break up his marriage, stealing documents from his
 28 car, and attempting manufacture evidence against him by setting

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1 him up to be charged with an effort to infiltrate and take over
2 Scientology in allegedly assisting the I.R.S. in planting false
3 documents within Scientology.

4 12. I was also aware of Fair Game activities that
5 Scientology perpetrated against Michael Flynn, who was Armstrong's
6 counsel. Said activities included, but were not limited to, the
7 infiltration of Flynn's offices by Scientology operatives, theft
8 of attorney-client and attorney work product documents from
9 Flynn's office and office garbage, the filing of bar complaints
10 and lawsuits against Flynn which had no merit, the filing of
11 motions which had no merit, and personal harassment against Flynn
12 and his family which included placing water in the gas tank of
13 Flynn's airplane and an attempt to frame him and have him jailed
14 for forging a check from one of L. Ron Hubbard's bank accounts in
15 the amount of \$2,000,000.00 by using its chief private
16 investigator, Eugene Ingram, to obtain a false declaration from
17 one Ala Tamini.

18 13. The purpose of perpetrating such Fair Game activities
19 against Armstrong's counsel, Michael Flynn, was to force him to
20 cease representation of Armstrong and others against Scientology.

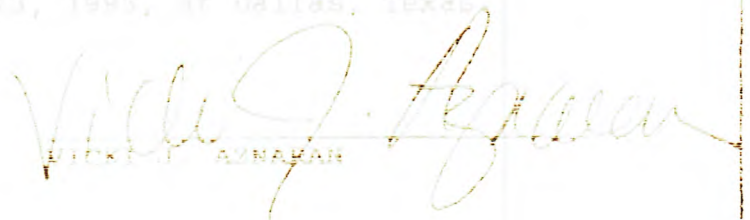
21 14. When that tactic failed, Scientology offered Flynn a
22 large block of money, \$3-5 million, to use to settle all of the
23 cases wherein he represented persons suing Scientology. Flynn was
24 told that he would have to make the cases "go away" with the money
25 that he was given. One of those cases was the case wherein he
26 represented Gerald Armstrong entitled Church of Scientology of
27 California v. Armstrong, Los Angeles Superior Court Action No. C
28 420153. Scientology ultimately lost its case against Armstrong in

1 a court trial before Judge Breckenridge and was very frightened of
2 Armstrong's cross-complaint against it. This case was ultimately
3 settled along with a mass of other cases wherein Flynn was
4 plaintiffs' counsel. Armstrong was required to sign a settlement
5 agreement wherein he promised not to talk, write or otherwise
6 communicate his knowledge of Scientology, to avoid participation
7 in litigation involving Scientology including avoiding service of
8 process, not oppose Scientology's appeal of Judge Breckenridge's
9 decision and to assist Scientology in its effort to obtain
10 evidence from the federal government regarding Mission Corporate
11 Category Sort-Out (an action involving litigation of the crime-
12 fraud exception to the attorney-client privilege). The purpose of
13 the settlement contract with Armstrong and the others was to
14 suppress evidence of Scientology's systematic practices of
15 criminal and civil wrongdoing.

16 15. I am aware that my faxed signature will be appended to
17 this document and authorize the use of the same.

18 I hereby declare under penalty of perjury pursuant to the
19 laws of the State of California that the foregoing is true and
20 correct.

21 Executed on September 13, 1995, at Dallas, Texas.

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VICKI J. AZNAVAR



Phoenix Investigations

5521 Greenfile Ave. Suite 104
Dallas, TX 75206

Date:

9-13-93

To:

Fred Greene

Company:

Fax Phone Number:

915 456-5317

cc:

From:

Vicki

Subject:

of Pages (including this cover sheet):

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